

LOUISE T. COOLEY	*	IN THE
316 Rockwell Terrace	*	
Frederick, Maryland 21701	*	CIRCUIT COURT
Plaintiff	*	OF MARYLAND
vs.	*	FOR FREDERICK COUNTY
PAUL E. RIPPEON	*	Case No. 17715
315 W. Second Street	*	
Frederick, Maryland 21701	*	
and	*	
ALL PERSONS HAVING OR	*	
CLAIMING TO HAVE AN INTEREST	*	
IN THE HEREIN DESCRIBED	*	
PROPERTY	*	
Defendants		

* * * * *

MEMORANDUM IN SUPPORT OF
MOTION FOR INTERLOCUTORY INJUNCTION

I. STATEMENT OF FACTS.

As set forth in the Plaintiff's Complaint to Quiet Title and/or to Establish Title by Adverse Possession and for Injunctive Relief, and the accompanying Affidavit of Plaintiff Louise T. Cooley, the property which is the subject of this suit is a rectangular parcel of property which is directly adjacent to property owned by the Plaintiff known as 202 College Avenue, Frederick, Maryland. The said 202 College Avenue property consists of a lot improved by a two-story building, which building is used as a residential apartment building. The Plaintiff rents the apartments in the building to various tenants, and currently the building is fully rented and is now the home of four (4) tenants, in four (4) individual apartments. The Plaintiff has so utilized the 202 College Avenue property since she purchased it in 1984; and furthermore her predecessors in